



Christopher R. Neff

cneff@mb-llp.com

345 Seventh Avenue
New York, NY 10001
Phone: (212) 221-7999
Fax: (646) 833-1661

September 30, 2021

By ECF

Hon. Vernon Broderick
United States District Judge
Southern District of New York
40 Foley Square
New York, NY 10007

APPLICATION GRANTED
SO ORDERED 
VERNON S. BRODERICK
U.S.D.J. 10/1/2021

Re: Ricardo Castro and Jeff Jackson v. AABC Construction, Inc. et ano.
17 Civ. 1205 (VSB) (KNF)

Dear Judge Broderick:

This firm represents Plaintiffs Ricardo Castro and Jeff Jackson in the above-captioned matter. I write, with the consent of counsel for defendant Daniel Sheeri, to request a brief additional extension of the parties' time to file pretrial submissions.

Counsel is working collaboratively to prepare the required joint pre-trial order, but will require additional time to resolve the last outstanding issues and to finalize the filing for submission to the Court.

Accordingly, I respectfully request:

(1) That the deadline for submission of a joint pre-trial order and of motions *in limine*, currently set for October 1, 2021, be extended through and including October 15, 2021; and

(2) That the deadline for submission of oppositions to motions *in limine*, proposed voir dire questions, proposed verdict sheets, and proposed jury instructions be extended from October 15, 2021 through and including October 29, 2021.

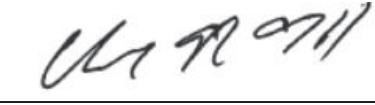
Although the Court has previously granted several such extensions, it is respectfully submitted that, because this matter is not currently scheduled for trial, no prejudice will result from this additional adjournment.

Hon. Vernon Broderick
September 30, 2021
Page 2 of 2

Thank you for your consideration of this letter.

Very truly yours,

MOSKOWITZ & BOOK, LLP

By: 

Christopher R. Neff

cc: All counsel of record, via ECF